

**BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001**

RECEIVED  
FEB 23 3 00 PM '00  
POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

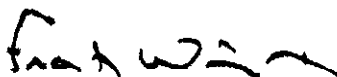
**POSTAL RATE AND FEE CHANGES, 2000**

**Docket No. R2000-1**

**INTERROGATORIES OF  
ASSOCIATION FOR POSTAL COMMERCE  
TO USPS WITNESS MOELLER  
(PostCom/USPS-T-35-1)**

Pursuant to Sections 25 and 26 of the rules of practice, the Association for Postal Commerce submits the attached interrogatory to USPS witness Moeller PostCom/USPS-T-35-1. If the designated witness is unable to respond to any interrogatory, we request a response by some other qualified witness.

Respectfully submitted,



Ian D. Volner  
N. Frank Wiggins  
Venable, Baetjer, Howard & Civiletti, LLP  
1201 New York Avenue, N.W.  
Suite 1000  
Washington, DC 20005-3917

Counsel for Association for Postal Commerce

PostCom/USPS-T-35-1. Please refer to line 22 on page 13 through line 3 on page 14, where you state, "Another reason to maintain the automation discounts is the expectation that many future mail processing developments will involve more extensive automated sortation of flats and will be enhanced by the presence of a mailer-applied barcode."

(a) Please confirm that reducing automation discounts will most likely reduce mailer investment in automation.

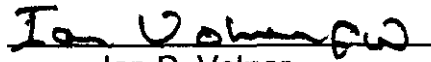
(b) Please list and describe all reasons why the value of a barcode will increase in the future

(c) Please provide all studies and reports that describe why the value of a barcode will increase in the future.

(d) Please provide all studies and reports that quantify the increase in the value of a barcode in the future flats mail processing environment.

## CERTIFICATION

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding having requested service of discovery documents in accordance with Section 12 of the rules of practice.

  
Ian D. Volner